

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION**

SITEPRO, INC.,

Plaintiff,

v.

TANKLOGIX, LLC

Defendants.

C.A. NO. 7:25-CV-00266

JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SitePro, Inc. (“SitePro”) files this Original Complaint for patent infringement against Defendant TankLogix, LLC (“TankLogix” or “Defendant”) respectfully alleging as follows:

THE PARTIES

1. Plaintiff SitePro, Inc. is a Delaware corporation having its principal place of business at 9502 US-87, Lubbock, TX 79423. SitePro has an additional place of business located at 1523 E. Sonterra Blvd., San Antonio, TX 78258.

2. Defendant TankLogix, LLC is a Utah limited liability company with a registered principal place of business at 1082 West 1700 North, Logan, UT 84321. TankLogix also maintains a regular and established place of business at 12200 W. Highway 80E, Odessa, TX 79765-9610. TankLogix may be served through its registered agent, Gary Wilson, 12200 W. Highway 80E, Odessa, TX 79765-9610.

3. A substantial part of the events giving rise to SitePro’s causes of action as alleged herein occurred in the Western District of Texas and have a direct effect on SitePro in the Western District of Texas.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. § 271.

5. As discussed in greater detail below, TankLogix has committed acts of patent infringement and/or has induced and/or contributed to acts of patent infringement by others in this judicial district, the State of Texas, and elsewhere in the United States, and continues to do so willfully and without authorization by making, using offering for sale, selling, or importing various products or services that infringe SitePro's Asserted Patent (defined below).

6. This Court has personal jurisdiction over TankLogix because TankLogix has minimum contacts within the State of Texas; TankLogix has purposefully availed itself of the privileges of conducting business in the State of Texas; Defendant regularly conducts business within the State of Texas; and SitePro's causes of action arise directly from TankLogix's business contacts and other activities in the State of Texas, including by virtue of TankLogix's infringement in the State of Texas. Indeed, TankLogix has advertised, promoted, offered for sale, sold and/or distributed and continue to advertise, promote, offer for sale, sell, and/or distribute infringing products to customers and potential customers in this judicial district. SitePro, its customers, and its potential customers reside in the State of Texas, including in this judicial district and therefore TankLogix's acts giving rise to this lawsuit and the harm SitePro has suffered have both occurred in this judicial district.

7. Venue is appropriate in this judicial district under 28 U.S.C. § 1400(b) because TankLogix has committed acts of infringement in and/or has induced and/or contributed to acts of infringement by others in this District, and maintains a regular and established place of business

in, this District as set forth above, including at least at TankLogix's Odessa office at 12200 W. Highway 80E, Odessa, TX 79765-9610.

BACKGROUND

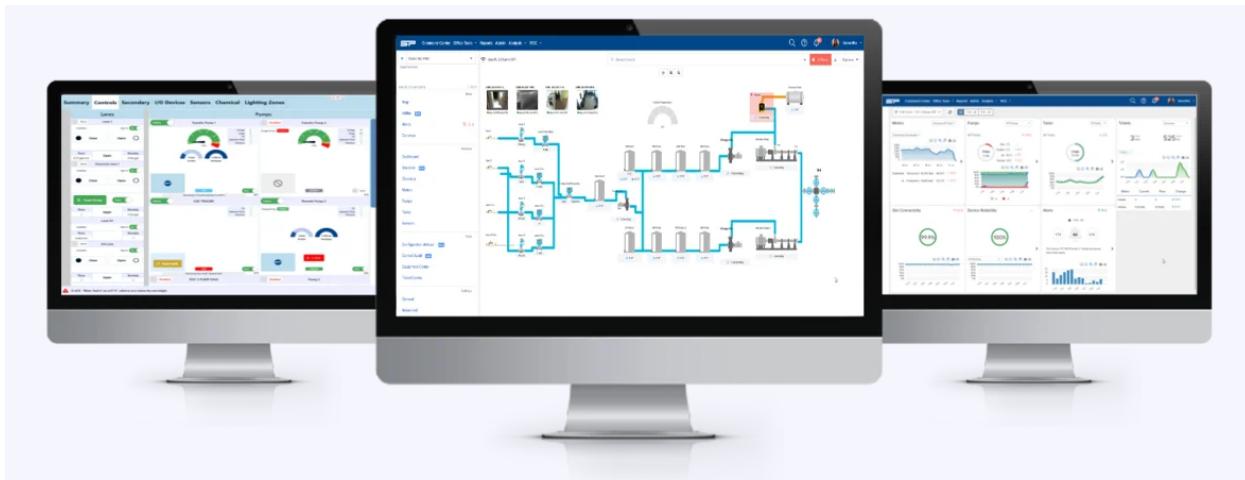
8. For more than a decade, SitePro has been at the forefront of data analytics, monitoring, and control of fluids in the energy (saltwater disposal ("SWD") and Oil & Gas), municipal, and agriculture industries. SitePro initially sought to enable the digital oil field. From there, it evolved its technology for use in the municipal and agriculture industries. SitePro focuses on developing market-leading software and hardware products that deliver easy-to-use, scalable fluid analytics, monitoring, and control. SitePro has developed and continues to develop state-of-the-art, award-winning software products, hardware, and equipment. SitePro combines an integrated, best-in-class cloud-based software as a service (SaaS) and mobile application. Both SitePro's software and hardware products and cloud services are vital to SitePro and its customers' businesses.

9. SitePro began as AmpliSine Labs, LLC, which was founded in November 2009. The company was founded to focus on reimagining control and management systems in the underserved SWD market, which in 2011 was a process-intensive business with limited viable software options outside of expensive traditional supervisory control and data acquisition ("SCADA") systems. AmpliSine Labs changed its name to SitePro, LLC (Texas entity) in July 2018 and then ultimately to SitePro, Inc. effective January 1, 2019.

10. In the early days of the company, SitePro had initially explored using existing SCADA systems but quickly determined that the then state-of-the-art SCADA systems could not adequately serve the SWD industry or address the significant problems facing their potential SWD customers. SitePro's early executive team, Aaron Phillips and David Bateman, identified a need to develop their own proprietary system from scratch.

11. Traditional oil field control systems typically had an automation system installed onsite to control the equipment on that site, including pumps, valves, actuators, etc., while also gathering data from sensors within the system or input from individuals at the site. A separate system would allow for access to that data from a web-based platform.

12. SitePro's system was (and is) unique and went well beyond these traditional systems in developing proprietary technology that combined the onsite automation system with the web-based control platform in one application. SitePro became the missing link in oilfield digital fluid logistics. For example, SitePro's proprietary system features a "no-code" configuration module, advanced ticketing capabilities, and real-time integrated mapping and visualization never previously offered or envisioned by traditional SCADA systems. SitePro later departed from the physical server setup used by traditional systems at the time, and instead built its new platform on Microsoft's Azure cloud.



SitePro's proprietary system monitors tank levels, volumes, pressures, flow rates, and many other data points in real-time. It allows organizations to control pumps and valves right from a smartphone or a computer. SitePro's system is robust and comprehensive, covering real-time data analytics, truck ticketing transactions, and remote management of multiple sites (like an SWD facility) remotely from an office in a large city. SitePro's system also offered scalability well-

beyond traditional SCADA systems by pre-programming and creating new parameters for certain nodes and equipment commonly found in a SWD system so that customers (regardless of technical aptitude/familiarity) could quickly and safely add, remove, edit, and control equipment, such as actuators, pumps, valves, and sensors. SitePro additionally developed a mobile application so that its customers could access data, collect data, and control equipment from their mobile devices. In fact, SitePro's proprietary system enabled a sensor reading to be delivered to a user's browser or mobile application less than one second after it was taken in the field.

13. SitePro has been awarded multiple United States patents for its inventions in many technical areas including edge computing, protocol translation (e.g., in which a remote server speaks a single universal language to monitor and control systems in the field, and local "site master controllers" translate those commands in the universal language to device-specific protocols, like Modbus, USB, etc.), and multi-tenant SaaS systems for monitoring and controlling fluid-handling equipment.

14. SitePro owns the entire right, title, and interest in and to U.S. Patent No. 12,321,184 (the "'184 Patent" or the "Asserted Patent"), including the right to seek damages for past and ongoing infringement. SitePro also owns many other patents and patent applications that are not asserted in this case at this time.

15. The '184 Patent issued on June 3, 2025. A true and correct copy of this patent is attached hereto as Exhibit 1.

16. The named inventor of the '184 Patent is Aaron Phillips. The title of the '184 Patent is "Remote control of fluid-handling devices."

17. Aaron Phillips invented and had a complete conception of the subject matter covered by the '184 Patent at least as early as January 2012. The date of invention for the '184

Patent is supported by significant evidence (e.g., original inventor notes; early versions of code; customer invoices).

18. SitePro has complied with the marking requirements of 35 U.S.C. § 287 at least because its patents are displayed publicly on SitePro's website—<https://www.sitepro.com/legal/patent-information>—as well as SitePro's customer login portal—<https://auth.sitepro.com/Account/Login>.

19. On TankLogix's website, TankLogix advertises that it provides “innovative, robust automation for the oil and gas industries.” *See* <https://www.tanklogix.com/about/>. TankLogix's website offers a variety of services, including “Oilfield Automation,” “Instrumentation & Electrical,” “Hosted Ignition,” “Remote Monitoring,” “Motors and VFDs,” and “Site Safety Systems.” Upon information and belief, these services are each available to TankLogix's clients and customers through TankLogix's Ignition-Hosted Automation System (“the Accused System”).

Id.

20. TankLogix indicates that it offers “Comprehensive Hosted SCADA” services as part of the Accused System. *See* <https://www.tanklogix.com/hosted-ignition/>. TankLogix further states that it is an “Ignition Registered Integrator.” *Id.*

Comprehensive Hosted SCADA

TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered by Inductive Automation's Ignition platform. Easily connect with, collect data from, and control your field devices over our secure network. Your data is safely hosted on our cloud-based infrastructure, providing top-tier reliability and integrity. Intuitive design and robust features in our desktop and mobile software provide powerful insights and monitoring of your data and operations. Reduce IT resource strain by having us handle the software development, network, IT infrastructure, and maintenance so you can focus on production and profitability.



Looking for help in Ignition? TankLogix is a Registered Integrator with Inductive Automation. Many of our engineers have attended Ignition Core and Ignition Advanced training. TankLogix is ready to assist with any of your Ignition needs.

I. SitePro's '184 Patent is Directed to Mediums and Systems for Improving the Remote Control of Fluid-Handling Devices—Not an Abstract Idea

24. As described below, the claims of the '184 Patent provides several technical solutions to tangible, technical problems experienced by the field of oil and gas monitoring and control at the time of the priority date of the '184 Patent. Indeed, the '184 Patent describes multiple inventions that provide marked improvements to the prior art's limited practice of remote control of fluid-handling devices.

A. Background of the Technical Field of Oil and Gas Monitoring and Control

25. Historically, fluid-handling facilities, such as oil wells and salt water disposal facilities, required manual supervision, with facility operators hiring “pumpers” to travel to various production sites, often in remote, isolated areas, to monitor the facilities and production.

26. At the time of the '184 Patent's priority date, supervisory control and data acquisition (“SCADA”) systems provided some remote monitoring of the facilities; however, SCADA's technical capabilities were limited, making its use in remote oil and gas fluid-handling facilities unattractive.

27. At the time of the '184 Patent's priority date, one significant problem limiting the application of SCADA systems in diffuse, remote locations was their reliance on a reliable network connection. Such connections were often lacking at remote oil and gas-related fluid-handling facilities due to the lack of reliable wireless infrastructure in rural areas. A strong network

connection was essential to the operation of SCADA systems at the time because any time logic more complex than rudimentary control logic (e.g., timers and ladder logic on programmable logic controllers) was required, it had to be implemented in the SCADA master station. At the time, SCADA master stations provided a centralized point of control and monitoring by being centrally located (and thus remote from the fluid-handling sites). As a result, unreliable networks often prevented the use of SCADA for remote control of fluid-handling sites that relied on more complex logic only suitable for execution in the SCADA master station. This problem is described in the specification of the '184 Patent:

[M]any of these systems fail when a network connection is lost. Remote logic controlling such systems generally ceases to exercise control when the remote logic is disconnected in the event of a network failure. Further, some SCADA systems require the installation of special-purpose software on a computing device in order to exercise control remotely, which tends to deter users from exercising remote control of fluid-handling devices due to the burden of configuring each computer from which remote control is exercised.

'184 Patent at 1:67-2:10.

28. A second problem faced by existing SCADA systems at the time of the '184 Patent's priority date was that the lack of native interoperability made it difficult to scale such systems. As noted in the passage quoted above, "some SCADA systems require the installation of special-purpose software on a computing device in order to exercise control remotely." *Id.* Each time a new device was added in the field, the SCADA master station needed to be taken down to install special-purpose software for that device, potentially halting operations in an entire region just to change a sensor at one well site or install a pump at another, for example.

29. The need to install special-purpose software in the SCADA master station arises because fluid-handling devices are varied in nature, function, and origin. Different fluid-handling devices (e.g., pumps, valves, motors, etc.) each "speak" different languages, and thus require translation of commands into each fluid-handling device's own language before they can be

understood and executed. The variety of different languages (or “protocols”) necessary to operate a complex facility like a salt-water disposal site poses a problem that becomes even more difficult when manufacturers of fluid-handling devices operate with their preferred choice of protocol, which often differs from other manufacturers’ preferred protocol. When multiple fluid-handling devices from different manufacturers operating under different protocols are implemented together at a facility, the prior art SCADA systems suffered from scaling issues and fragility, as the centralized SCADA master station underwent new software installations any time a new device was installed in the field.

B. SitePro’s ’184 Patent Provides an Inventive Solution to the Problem Faced by SCADA Systems Which Fail During a Network Outage: Pushing Program Logic to the Edge of the Network.

30. The ’184 Patent improves upon SCADA system technology by addressing the shortcomings of then-existing SCADA networks by providing methods, systems, and processes to continue operation, control, and monitor fluid-handling facilities without maintaining a stable network connection. The ’184 Patent solved this problem by offering a new, inventive element—pushing program logic to the edge of the network of fluid-handling sites and devices. For example, the ’184 Patent discloses operations comprising, *inter alia*:

obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system, such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices; [and]

sending, with the first computing system, the site data stored in the report buffer to a remote second computing system.

’184 Patent at 17:25-35.

31. Furthermore, as another example, the ’184 Patent discloses:

The site master-controller **18**, thus, may be operative to receive commands from the site server **36** of the command-center server **14**, translate those commands, identify the appropriate control bus **60** and, if needed, address on the control bus, and implement the command once received, even if network access is lost after the command is issued from the command-center server **14**. Further, the site master-controller **18**, in some embodiments, is operative to retrieve sensor data, alarms, and other site data, and buffer such data in the report buffer **104**, before the data is periodically returned to the command-center server **14**, such that buffered data is not lost if network access ceases intermittently.

'184 Patent at 11:20-31.

32. As another example, the '184 Patent discloses a system comprising, *inter alia*:

a fluid-handling site;

a plurality of fluid handling devices at the fluid handling site; and

a first computing system communicatively coupled to the plurality of fluid handling devices, the first computing system storing instructions that, when executed by the first computing system, effectuate operations comprising . . .

for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection . . .

obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices;

sending, with the first computing system, the site data stored in the report buffer to a remote command center server . . .

'184 Patent at 20:54-22:5. *See also*, e.g., '184 Patent at Fig. 1 and Fig. 3.

33. This provided a tremendous benefit: under this invention, if a fluid-handling site lost connection with the central server of the broader SCADA system, the fluid-handling site could continue to execute relatively complex logic with field devices, record data, and send that data back to the broader SCADA system when the network came back online. This also provided an important efficiency: ensuring the continued remote monitoring of fluid-handling facilities, even

in the event of a network outage. Under the inventions claimed by the '184 Patent, the fluid-handling sites can continue to control devices even in the absence of a connection to the broader network, instead of rendering the system inoperable.

C. SitePro's '184 Patent Provides Another Inventive Solution to the Problem of Overburdened SCADA Systems that Translate and Issue Commands from a Central Command Server—Performance of Protocol Translation at the Edge of the SCADA Network.

34. A second, distinct invention offered by the '184 Patent is the ability of the disclosed system to perform protocol translation at the edge of a SCADA network to shield the broader SCADA system from the complexity of managing diverse protocols implemented by sensors and actuators in the field. This provided a significant benefit to then-existing SCADA systems, which had to manage an extremely varied and diverse set of protocol languages—which are often quite different for each type and brand of fluid-handling device (e.g., pumps, motors, valves, etc.)—from a centralized command-center server. By implementing systems and methods that use innovative protocol translation at the edge of the network, rather than at the command-center level, the resiliency and scalability of the SCADA system are increased, providing significant efficiency in operation and reducing strain on the network. Moreover, protocol translation at the edge of a network presents the additional efficiency of allowing computer engineers to draft command prompts in a single language at the command-center server level, rather than having to write commands in the different and varied languages of fluid-handling devices in the field.

35. To exercise the invention of SitePro's Asserted Patent, the '184 Patent requires the use of unique hardware and software distinguishable from the functions of a typical computer used in the field of oil and gas monitor and control. For example, the '184 Patent disclose the use of an edge-based “protocol multiplexer,” a unique and novel component not present in then-existing SCADA systems. This component is disclosed, for example, in the '184 Patent which claims a

medium storing instructions that, when executed by one or more processors, effectuate operations comprising, *inter alia*:

translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given first fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in the targeted states among the plurality of different target states.

'184 Patent at 17:12-22.

36. The specification describes some of the abilities of the protocol multiplexer in the context of protocol translation at the edge of the SCADA network:

"[W]hen the site management module **70** receives a command via the network interface **68**, or issues its own command (e.g., to poll sensors or alarm logs), the command is conveyed to a protocol multiplexer **72**, which may be operative to determine which control bus **60** and fluid-handling device **38** will receive a corresponding translated command. For example, the protocol multiplexer **72** may store in memory records for communicating with the fluid-handling devices **38**. Each record may correspond to a[n] individual fluid handling device **38** or an individual actuator or sensor of a fluid-handling device, and each record may include a unique identifier of the corresponding device, actuator, or sensor; a control bus address of the device, actuator, or sensor (for those components on a control bus that is addressable); an identifier of the control bus **62**, **64**, or **66** through which the site master-controller **18** communicates with the device, actuator, or sensor, and an identifier of the protocol through which such communication occurs.

'184 Patent at 9:16-33.

37. The specification goes on to describe additional, specific structures implemented in the protocol multiplexer, including the specific forms of protocols themselves:

When a command is received at the protocol multiplexer **72**, in some embodiments, the command includes the identifier of the device, actuator, or sensor to which the command is directed, and using this identifier, the protocol multiplexer **72** retrieves the corresponding record from memory to identify the appropriate protocol. In this example, based on the protocol in the record, the protocol multiplexer **72** selects among the command translators **74**, each of which corresponds to a different protocol. For example, the command translator **80** may correspond to a protocol of control bus **66**, Such as the modbus RTU protocol; the command translator **78** may

corresponds to a protocol of the control bus **64**, such as a binary or analog voltage or current signal conveyed via a data acquisition board; and the command translator **76** may correspond to a protocol of the control bus **62**, such as the Ethernet protocol.

'184 Patent at 9:34-49.

38. Thus, far from using generic or conventional computing components, the '184 Patent requires special-purpose computing devices configured in the manner disclosed to ensure the continued monitor and operation of fluid-handling devices in the absence of a network connection as well as performance of protocol translation at the edge of a network. SitePro's Asserted Patent covers technology that provides specific means for obtaining specific improvements for specific problems in the field of data analytics, monitoring, and control of fluids in the energy, municipal fluid management, and agricultural industries.

COUNT I

TankLogix's Infringement of the U.S. Patent Nos. 12,321,184.

39. SitePro repeats and realleges as if fully set forth herein, the allegations set forth in the foregoing paragraphs of this Complaint.

40. TankLogix directly infringed and continues to directly infringe, under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, at least claims 1-31 of the '184 Patent by manufacturing, using, selling, offering to sell, and/or importing into the United States the Accused System.

41. TankLogix has been and is indirectly infringing the '184 Patent by actively inducing or contributing to the direct infringement by others of the '184 Patent in the United States, the State of Texas, and this District.

42. TankLogix also has been and is now knowingly and intentionally inducing infringement of at least claims 1-31 of the '184 Patent in violation of 35 U.S.C. § 271(b).

TankLogix has had knowledge of the '184 Patent and the infringing nature of the Accused System and other similar systems since at least the filing and service of this Complaint.

43. TankLogix specifically intended and was aware that the ordinary and customary use of the Accused System and other similar systems would infringe the '184 Patent.

44. TankLogix further took active steps to encourage end users to use and operate the Accused System and other similar systems, despite knowing of the '184 Patent, in a manner they knew to directly infringe at least claims 1-31 of the '184 Patent. Further, TankLogix provided product manuals and other technical information that cause their subscribers, customers, and other third parties to use and to operate the Accused System and other systems for their ordinary and customary use, such that TankLogix's customers and other third parties have directly infringed the '184 Patent, through the normal and customary use of the Accused System and other similar systems.

45. TankLogix also has been and are now in violation of 35 U.S.C. § 271(c) by contributing to infringement of at least claims 1-31 of the '184 Patent, literally and/or under the doctrine of equivalents, by, among other things, selling, offering for sale, and/or importing within this judicial district and elsewhere in the United States, the Accused System and other similar systems with knowledge of the '184 Patent and knowing that the Accused System and other similar systems are especially made or especially adapted for use in the infringement of the '184 Patent, and is not a staple article or commodity of commerce suitable for substantial noninfringing use.

46. TankLogix's infringement (both direct and indirect) of the '184 Patent has been, and continues to be, with full knowledge of the '184 Patent, since at least as early as the filing of this lawsuit, or as early as TankLogix employees have accessed the patent information on SitePro's website.

47. For example, Claim 30 of the '184 Patent recites:

A system, comprising:

a plurality of fluid handling devices; and

a first computing system communicatively coupled to the plurality of fluid handling devices, the first computing system storing instructions that, when executed by the first computing system, effectuate operations comprising:

receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices, wherein:

the plurality of commands are responsive to inputs to a command interface presented on a remote user computing device, and

the plurality of commands are received after determining that a user of the remote user computing device is authorized to issue commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user account being accessed from a data store;

for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection;

translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states;

sending, with the first computing system, the translated commands to the local controllers;

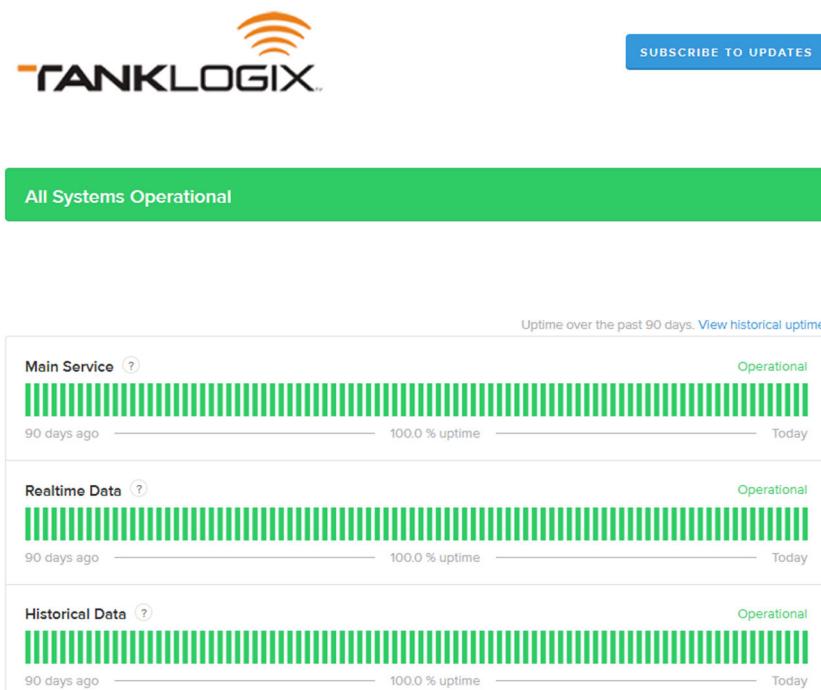
obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms,

measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices;

sending, with the first computing system, the site data stored in the report buffer to a remote second computing system.

48. By way of example, the Accused System meets every element of Claim 30.

49. To the extent the preamble is found limiting, the accused TankLogix products are each a system, as the example below demonstrates:



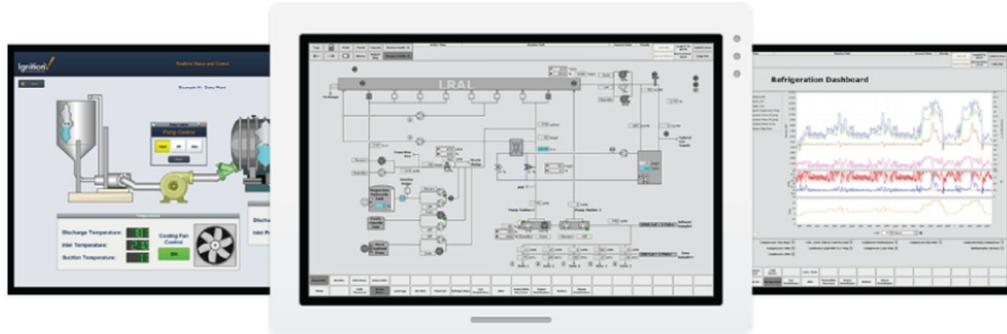
<https://status.tanklogix.com/>.

50. As shown in the example below, the Accused System further comprises a plurality of fluid handling devices:

Web-based HMI and SCADA applications deployment

Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way.

Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See and manage your entire system from one place.



<https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition>.

Tank Monitoring

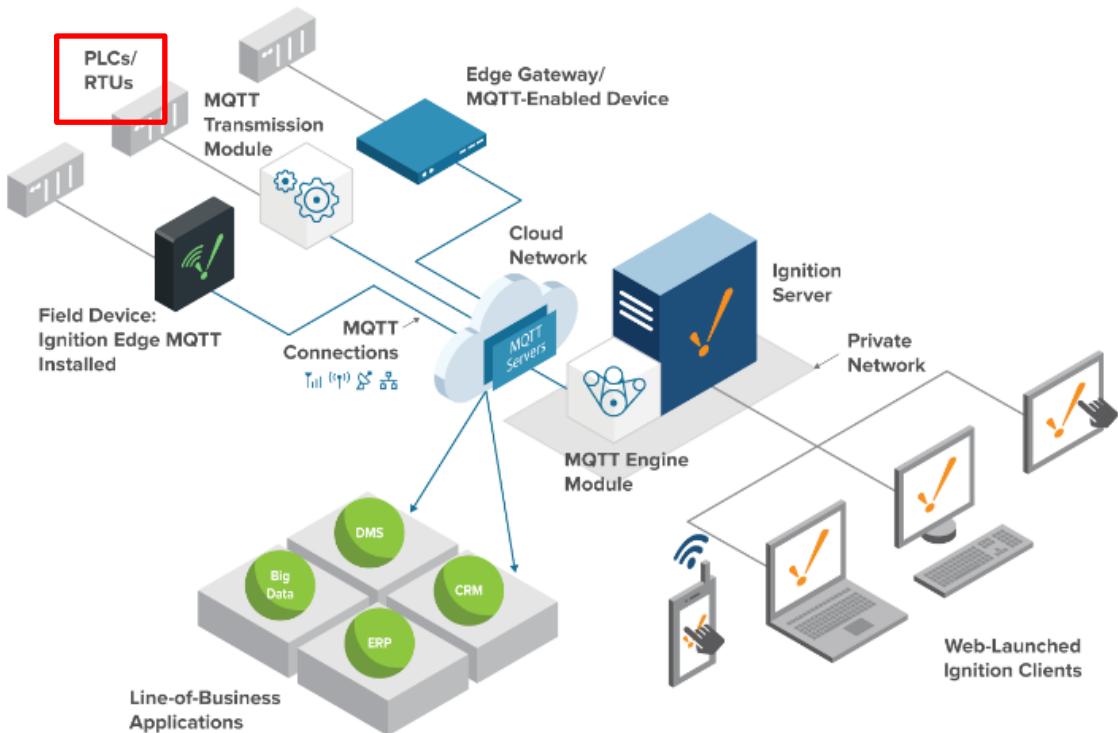
TankLogix provides a complete liquid inventory management system, the TankWarden. TankWarden empowers producers by giving them complete control over their liquid inventory and distribution.

- ✓ Eliminate manual tank gauging
- ✓ Web-based data tracking
- ✓ Cellular and satellite communication for even the most remote locations
- ✓ Single or dual level, high-precision, magnetostrictive sensors
- ✓ TankLogix brand sensors are oil & gas field grade, made in USA
- ✓ Provide flow and pressure readings to monitor pumps, flow lines, and vessels

<https://www.tanklogix.com/tank-monitoring/>.

51. As shown in the example below, the Accused System further comprises a first computing system (e.g., a PLC) communicatively coupled to the plurality of fluid handing devices, the first computing system storing instructions that, when executed by the first computing system, effectuate operations:

IIoT Architecture



<https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture>.

TANKLOGIX

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Hosted Ignition

Comprehensive Hosted SCADA

TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered by Inductive Automation's Ignition platform. Easily connect with, collect data from, and control your field devices over our secure network. Your data is safely hosted on our cloud-based infrastructure, providing top-tier reliability and integrity. Intuitive design and robust features in our desktop and mobile software provide powerful insights and monitoring of your data and operations. Reduce IT resource strain by having us handle the software development, network, IT infrastructure, and maintenance so you can focus on production and profitability.

<https://www.tanklogix.com/hosted-ignition/>.



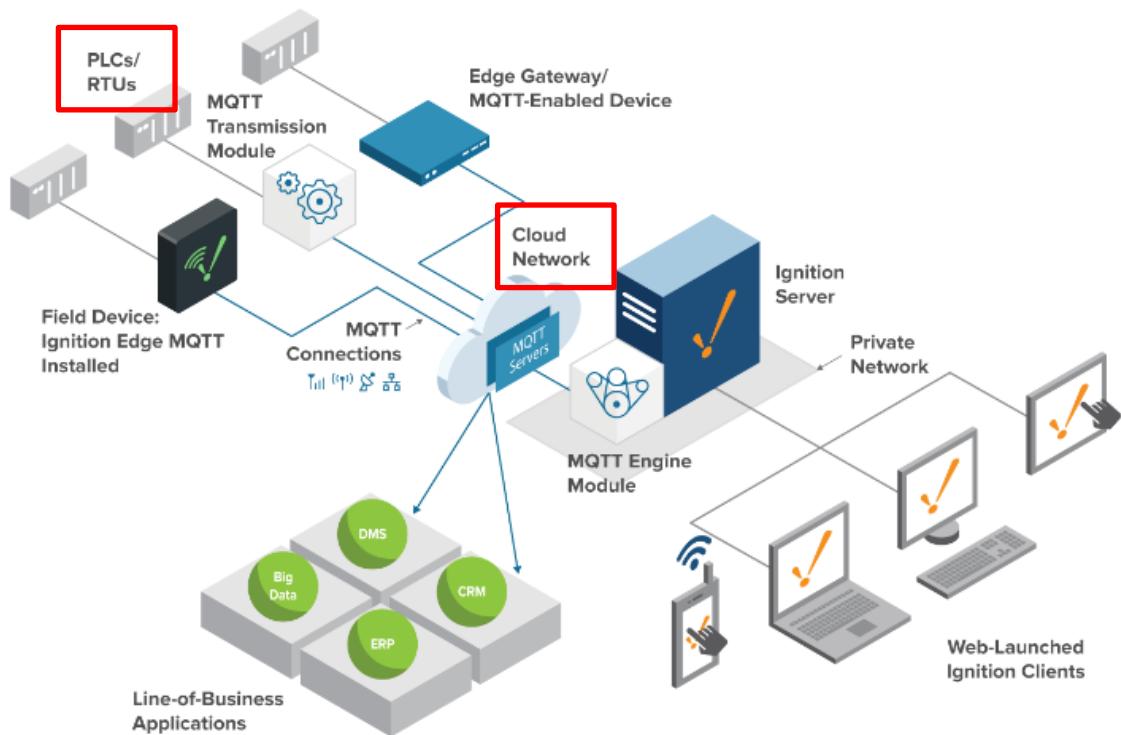
VFD Motors

- ✓ Premium Efficiency (95% or higher)
- ✓ Control transfer pumps and circulating pumps by time, pressure, or tank level
- ✓ Clear faults and start/stop pumps online without having to go on site
- ✓ Steel and cast iron frames available
- ✓ Stock motors include a two year warranty

<https://tanklogix.com/vfd-controls-and-motors/>.

52. As shown in the example below, the Accused System further comprises receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices:

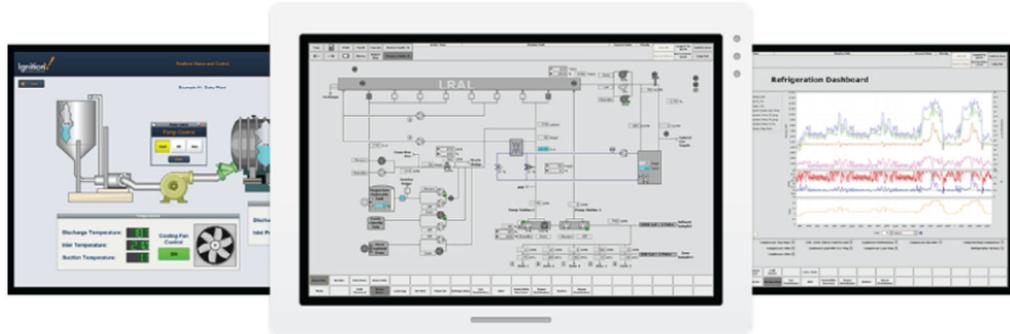
IIoT Architecture



<https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture>.

Web-based HMI and SCADA applications deployment

Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way. Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See and manage your entire system from one place.



<https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition>.

TANKLOGIX

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Hosted Ignition

Comprehensive Hosted SCADA

TankLogix Hosted **SCADA** (Supervisory Control and Data Acquisition) is powered by Inductive Automation's **Ignition platform**. Easily connect with, collect data from, and control your field devices over our secure network. Your data is safely hosted on our cloud-based infrastructure, providing top-tier reliability and integrity. Intuitive design and robust features in our desktop and mobile software provide powerful insights and monitoring of your data and operations. Reduce IT resource strain by having us handle the software development, network, IT infrastructure, and maintenance so you can focus on production and profitability.

<https://www.tanklogix.com/hosted-ignition/>.

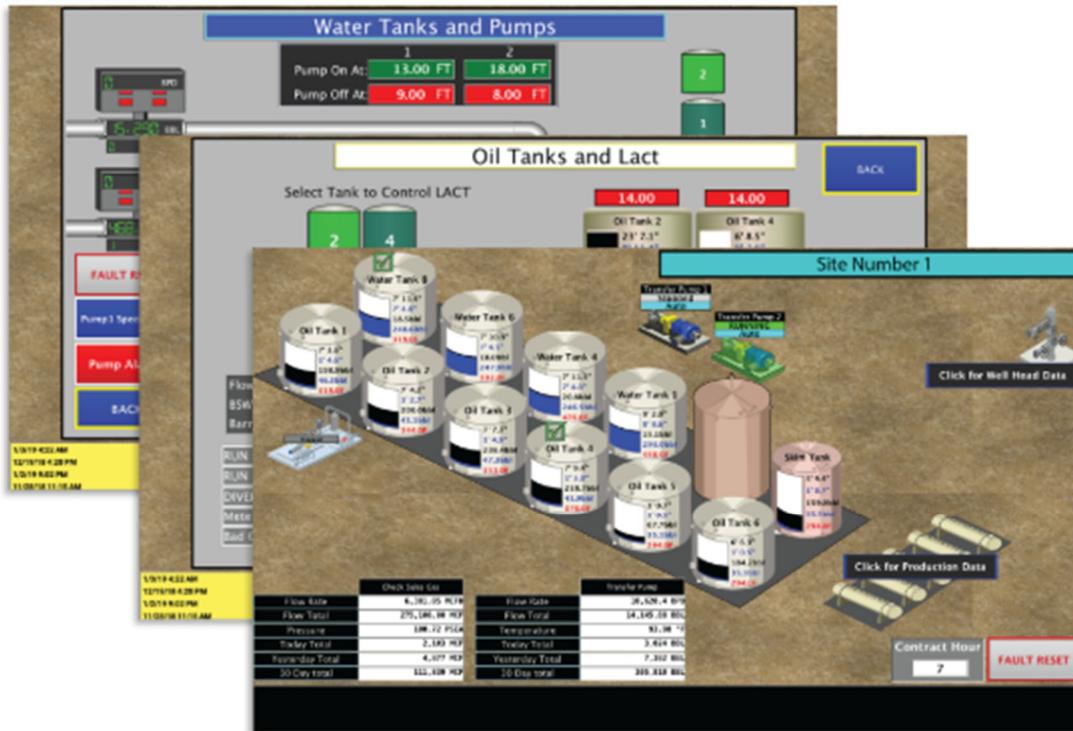


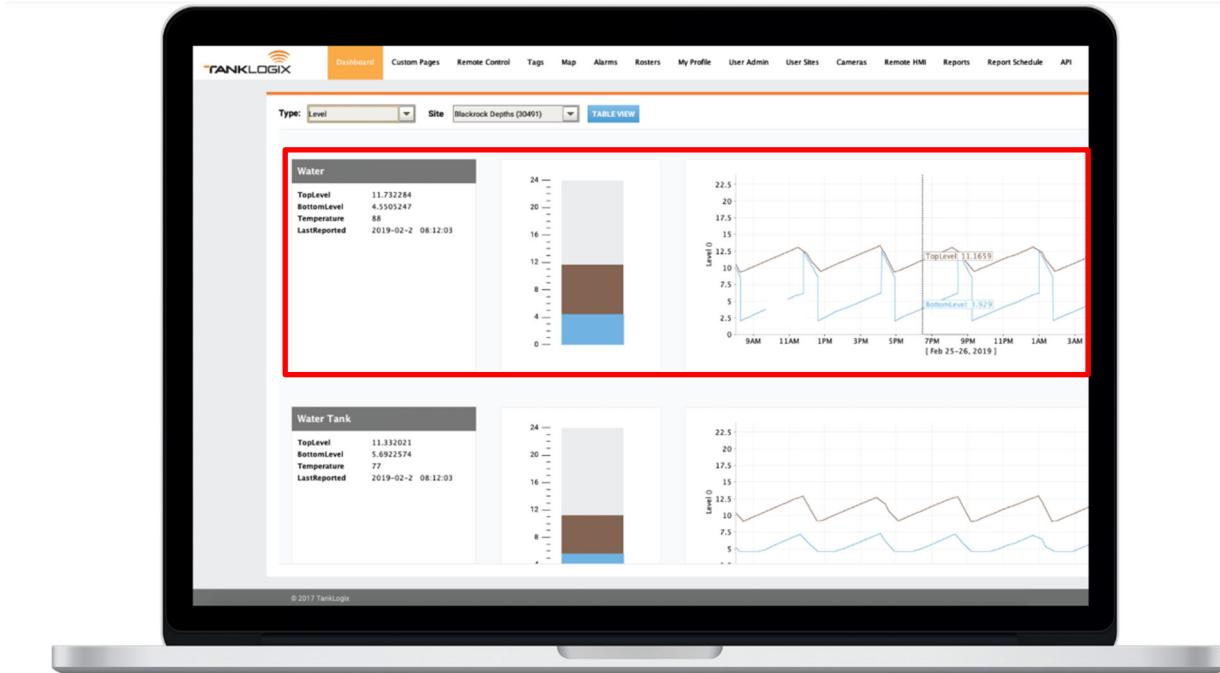
VFD Motors

- ✓ Premium Efficiency (95% or higher)
- ✓ Control transfer pumps and circulating pumps by time, pressure, or tank level
- ✓ Clear faults and start/stop pumps online without having to go on site
- ✓ Steel and cast iron frames available
- ✓ Stock motors include a two year warranty

<https://tanklogix.com/vfd-controls-and-motors/.>

53. As shown in the example below, the Accused System further comprises a plurality of commands that are responsive to inputs to a command interface presented on a remote user computing device:





<https://www.tanklogix.com/hosted-ignition/>.

Comprehensive Hosted SCADA

TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered by Inductive Automation's Ignition platform. Easily connect with, collect data from, and control your field devices over our secure network. Your data is safely hosted on our cloud-based infrastructure, providing top-tier reliability and integrity. Intuitive design and robust features in our desktop and mobile software provide powerful insights and monitoring of your data and operations. Reduce IT resource strain by having us handle the software development, network, IT infrastructure, and maintenance so you can focus on production and profitability.

<https://www.tanklogix.com/hosted-ignition/>.

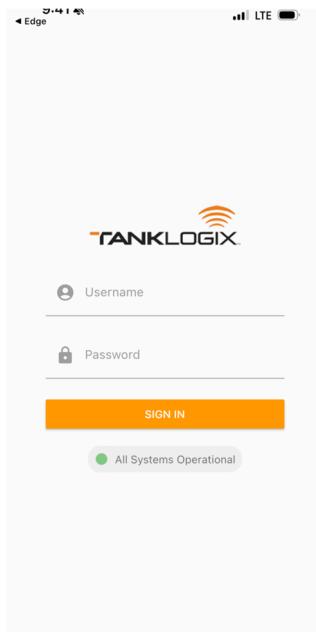


VFD Motors

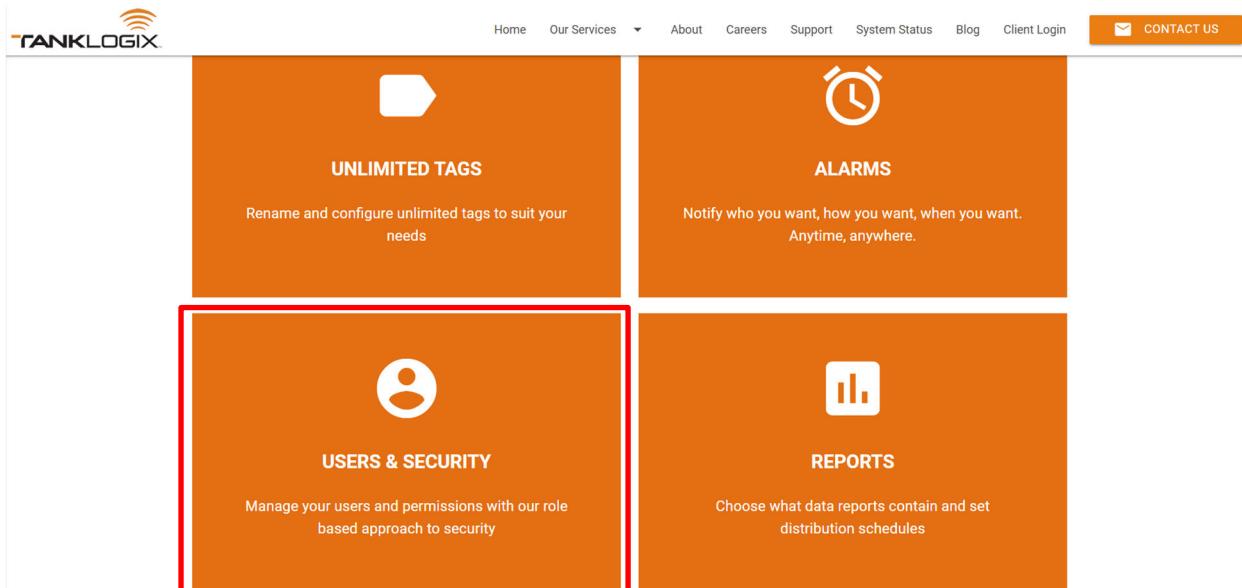
- ✓ Premium Efficiency (95% or higher)
- ✓ Control transfer pumps and circulating pumps by time, pressure, or tank level
- ✓ Clear faults and start/stop pumps online without having to go on site
- ✓ Steel and cast iron frames available
- ✓ Stock motors include a two year warranty

<https://tanklogix.com/vfd-controls-and-motors/>.

54. As shown in the examples below, the Accused System further comprises the plurality of commands being received after determining that a user of the remote user computing device is authorized to issue commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user account being accessed from a data store:

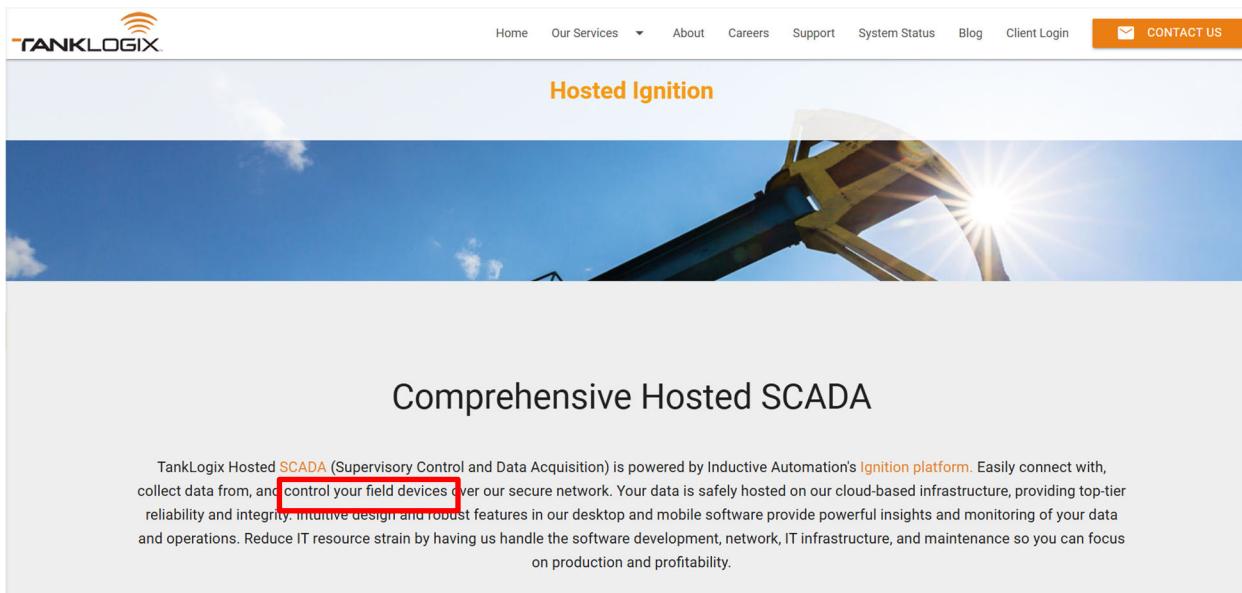


TankLogix mobile application login screen [accessed Dec. 18, 2024].



<https://www.tanklogix.com/hosted-ignition/> (annotated).

55. As shown in the example below, the Accused System further comprises for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection:



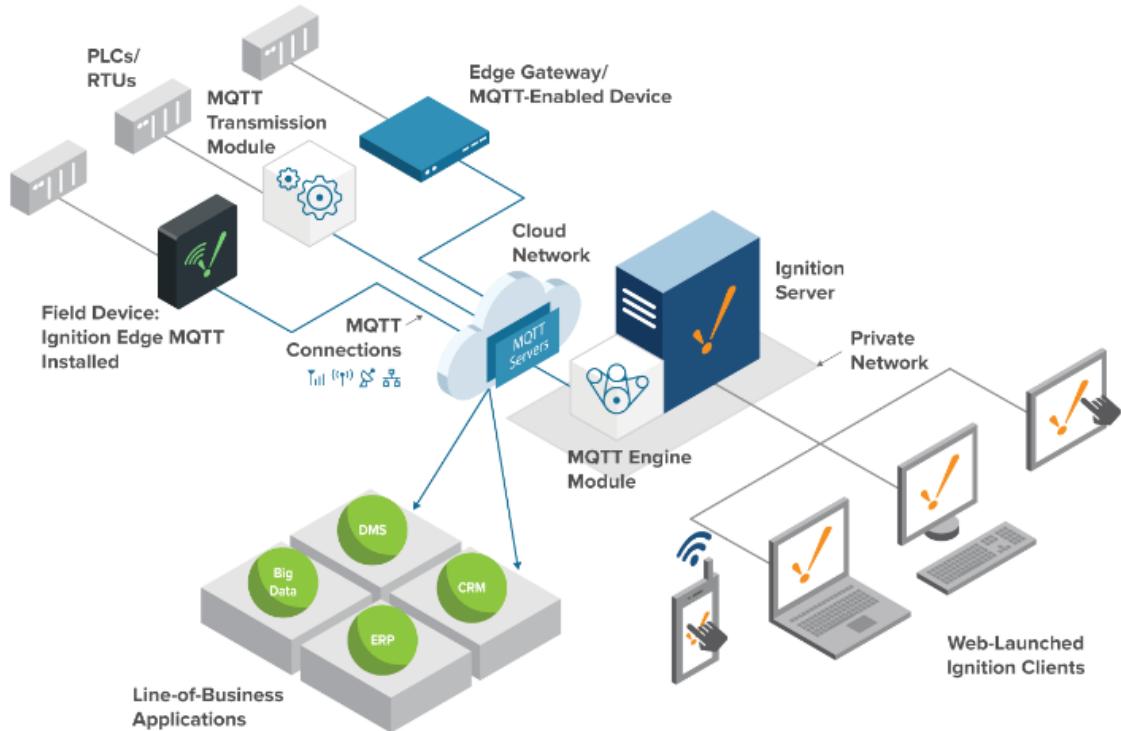


VFD Motors

- ✓ Premium Efficiency (95% or higher)
- ✓ Control transfer pumps and circulating pumps by time, pressure, or tank level
- ✓ Clear faults and start/stop pumps online without having to go on site
- ✓ Steel and cast iron frames available
- ✓ Stock motors include a two year warranty

<https://tanklogix.com/vfd-controls-and-motors/>. On information and belief, the Accused System also includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.

IIoT Architecture



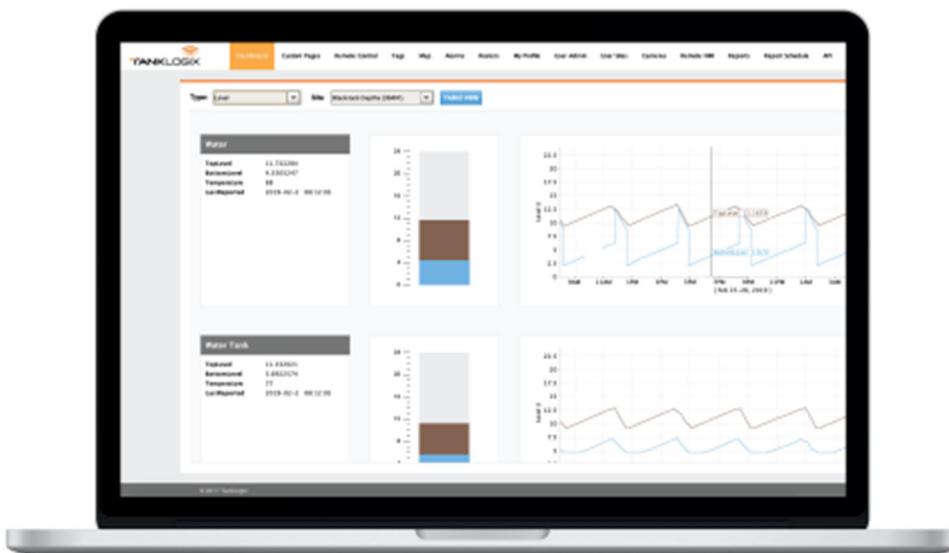
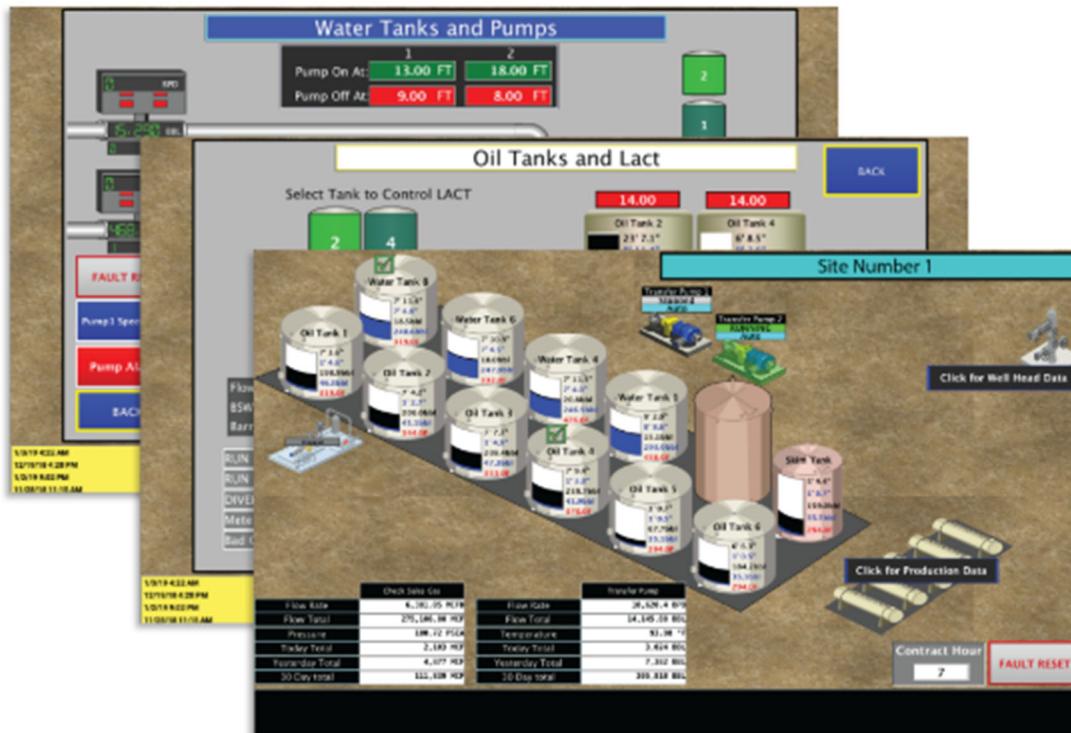
<https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture>.

PLC Automation

- Complete site automation
- Decrease production cost
- Reduce labor
- Raise productivity
- Increase safety
- Extend equipment service life

<https://www.tanklogix.com/oilfield-automation/>.

56. As shown in the example below, the Accused System further comprises translating, with the first computing system (e.g., PLC), the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller (e.g., a VFD) of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states:





Produced Wastewater

This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate truck dispatching to ensure that the producer doesn't have to slow down production.

TankLogix recognizes that trucking this water is expensive, which is why minimizing trucking expenses can greatly increase the bottom line. The Tank Warden System enhances transparency and accountability for both operators and transporters. The Tank Warden System can be configured to restrict access to **the valve** if the driver of the truck is not verified; it can also report instantly the amount of water/product that has been taken. This system has successfully enhanced tank security, while reducing theft and human error.

TankLogix has implemented the Tank Warden System at water disposal sites as well. These customers especially enjoy the automatic tank gauging system because they don't have to employ someone to permanently watch the tanks.

TankLogix has also provided other automated tank monitoring and field monitoring services to water disposal companies. Some of the other devices TankLogix can monitor at the wellhead are:

- ✓ Flow Meters
- ✓ Pumps
- ✓ H₂S and other gasses
- ✓ Premium Sensors

<https://www.tanklogix.com/hosted-ignition/>. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices. The Accused System supports communication with a variety of fluid-handling devices, including at least valves, tanks, pumps, flow meters, and sensors. On information and belief, these various fluid-handling devices are responsive to different protocols (e.g., analog in, digital in, Modbus, etc.), and the Accused System selects a protocol different from the shared protocol (e.g. TCP/IP) such that the fluid-handling device is responsive to the respective protocol.

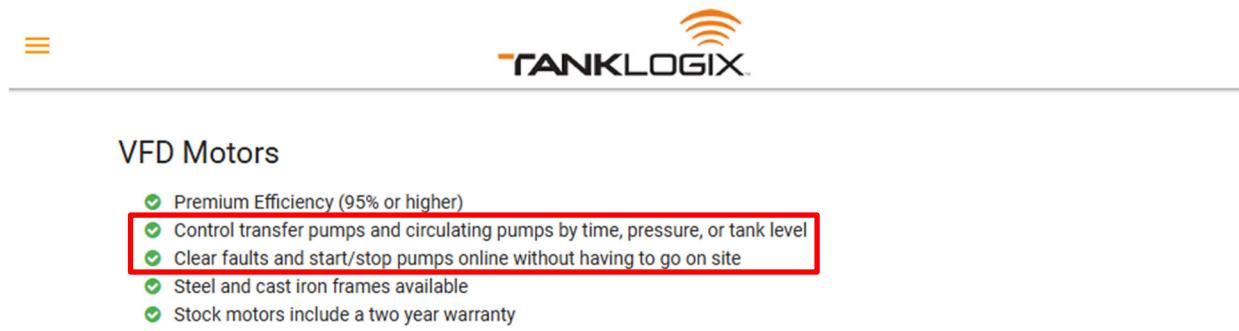


VFD Motors

- ✓ Premium Efficiency (95% or higher)
- ✓ Control transfer pumps and circulating pumps by time, pressure, or tank level
- ✓ Clear faults and start/stop pumps online without having to go on site
- ✓ Steel and cast iron frames available
- ✓ Stock motors include a two year warranty

<https://tanklogix.com/vfd-controls-and-motors/>. On information and belief, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command. These PID controllers also monitor feedback from the fluid-handling device to determine whether the fluid-handling device is in a target state.

57. As shown in the example below, the Accused System further comprises sending, with the first computing system, the translated commands to the local controllers:



VFD Motors

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- ✓ Clear faults and start/stop pumps online without having to go on site
- ✓ Steel and cast iron frames available
- ✓ Stock motors include a two year warranty

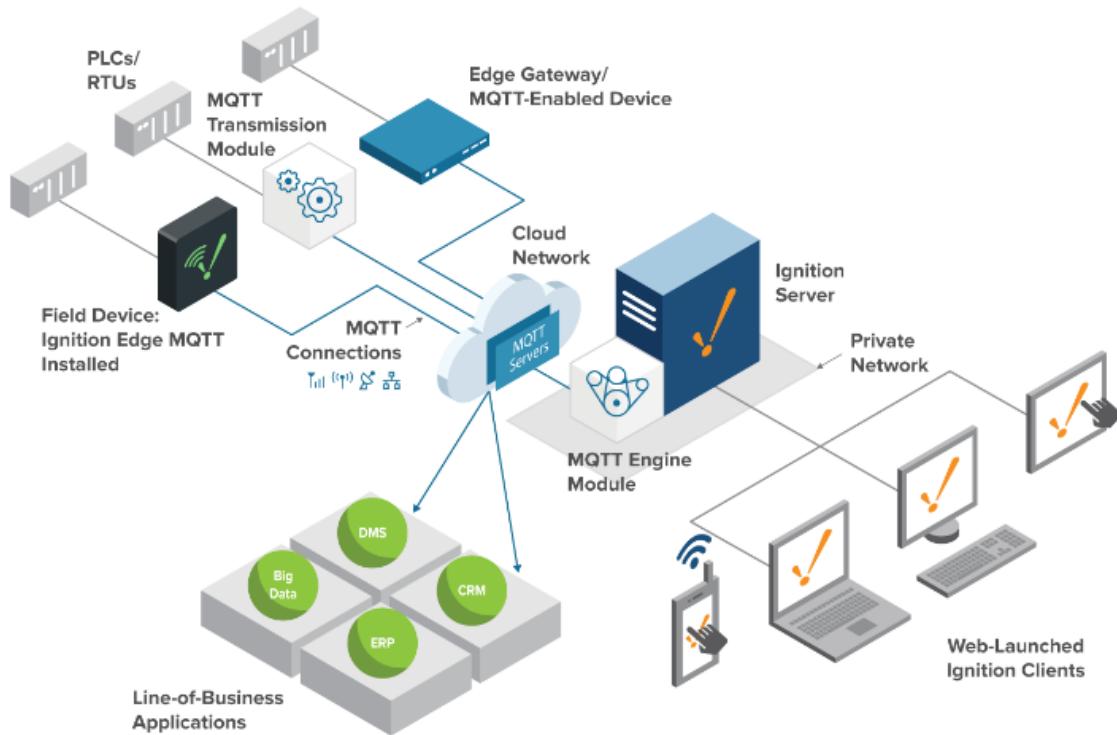
<https://tanklogix.com/vfd-controls-and-motors/>.

58. As shown in the example below, the Accused System further comprises obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices.

The image shows the header of the TankLogix website. It features the TankLogix logo with a stylized orange 'T' and 'L' followed by the word 'TANKLOGIX' in a sans-serif font. To the right is a horizontal navigation bar with links: Home, Our Services (with a dropdown arrow), About, Careers, Support, System Status, Blog, Client Login, and a yellow 'CONTACT US' button with an envelope icon. Below the navigation bar is a large, high-quality photograph of an oil pump jack against a bright blue sky with a few wispy clouds and the sun partially visible in the background.

<https://www.tanklogix.com/hosted-ignition/>.

IIoT Architecture



<https://www.does.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture>

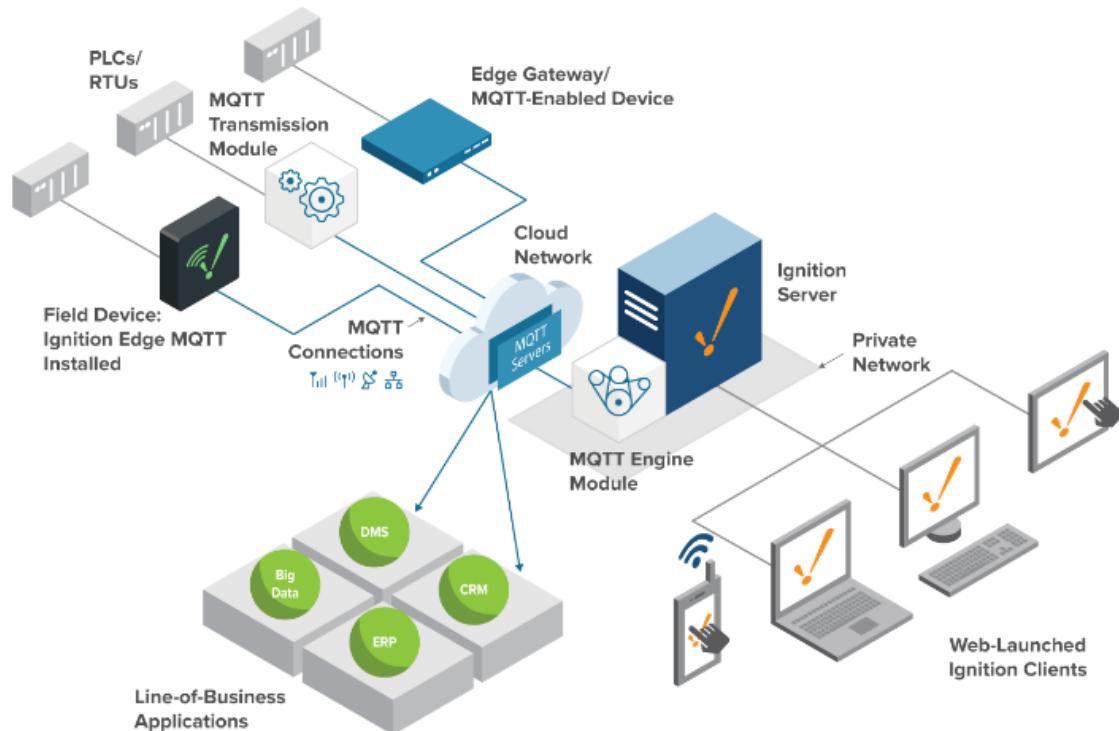
PLC Automation

- Complete site automation
- Decrease production cost
- Reduce labor
- Raise productivity
- Increase safety
- Extend equipment service life

<https://www.tanklogix.com/oilfield-automation/>.

59. As shown in the example below, the Accused System further comprises sending, with the first computing system, the site data stored in the report buffer to a remote second computing system:

IIoT Architecture



<https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture>. The Ignition Server shown by the schematic above is configured to receive data sent from the PLCs at the facilities.

60. As a result of TankLogix's infringement of the '184 Patent, SitePro has been damaged and is entitled to recover from TankLogix the damages sustained by SitePro as a result of TankLogix's acts in an amount adequate to compensate SitePro for TankLogix's infringement, subject to proof at trial.

61. TankLogix's knowing, willful, and deliberate infringement of the claims of the '184 Patent is in conscious disregard of SitePro's rights, makes this case exceptional within the meaning of 35 U.S.C. § 285, and justifies treble damages pursuant to 35 U.S.C. § 284, as well as attorneys' fees pursuant to 35 U.S.C. § 285.

62. To the extent TankLogix continues to implement other systems that are similar to the Accused System, and/or utilize Ignition or similar platforms, such activities constitute continued willful infringement by TankLogix.

PERMANENT INJUNCTION

63. SitePro repeats and realleges, as is fully set forth herein, the allegations set forth in the foregoing paragraphs of this Complaint.

64. SitePro seeks a permanent injunction incorporating the relief sought above on a preliminary basis, and further:

- (a) Barring Defendant TankLogix from competing with SitePro;
- (b) Providing for all additional restrictions necessary to protect SitePro from the harm likely to result from Defendant TankLogix's continued infringing conduct.

65. Permanent injunctive relief against TankLogix is appropriate because, as SitePro will demonstrate through separate motion and briefing:

- (a) Defendant TankLogix's conduct has caused and will continue to cause irreparable injury to SitePro;
- (b) Monetary damages will be inadequate to remedy the injury;
- (c) An injunction is warranted considering the balance of hardships between the parties; and
- (d) Issuing the injunction would not disserve the public interest.

Abraham v. Alpha Chi Omega, 708 F.3d 614, 627 (5th Cir. 2013) (citing *eBay, Inc. v. MercExchange, L.L.C.*, 547 U.S. 388, 391 (2006)).

JURY DEMAND

66. SitePro demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, SitePro requests the Court enter judgment in SitePro's favor and against TankLogix as follows:

- (a) That TankLogix has directly infringed, either literally or under the doctrine of equivalents, the Asserted Patent in violation of 35 U.S.C. § 271(a);
- (b) That TankLogix has induced and/or contributed to infringement and/or is inducing and/or contributing to infringement of the Asserted Patent, either literally or under the doctrine of equivalents;
- (c) Awarding SitePro its damages suffered as a result of TankLogix's infringement, including, but not limited to, a reasonable royalty pursuant to 35 U.S.C. § 284, SitePro's actual damages, enhanced damages, exemplary damages, costs, prejudgment and post judgment interest to be proven at trial;
- (d) Awarding SitePro costs and expenses pursuant to 35 U.S.C. § 284 or as otherwise permitted by law;

- (e) Ordering a permanent injunction against all present and future infringing acts by TankLogix or, in the alternative, an award of an ongoing royalty;
- (f) Finding that TankLogix's infringement has been willful at least as of the date of this Complaint, and awarding SitePro appropriate enhanced damages pursuant to 35 U.S.C. § 284;
- (g) Finding this case to be exceptional within the meaning of 35 U.S.C. § 285;
- (h) Awarding SitePro its costs, attorneys' fees, expenses, and interest;
- (i) Granting SitePro such other and further relief as the Court deems just and equitable.

Dated: June 6, 2025

Respectfully submitted,

/s/ M. Craig Tyler
M. Craig Tyler
Texas State Bar No. 00794762
CTyler@perkinscoie.com
Andrew Kalamarides
Texas State Bar No. 24136939
AKalamarides@perkinscoie.com
Helena E.D. Burns
Texas State Bar No. 24143961
HBurns@perkinscoie.com
PERKINS COIE LLP
405 Colorado Street, Suite 1700
Austin, Texas 78701
Tel: (737) 256-6100

Matthew Lutz (*pro hac vice*)
Arizona State Bar No. 038546
MLutz@perkinscoie.com
PERKINS COIE LLP
2525 E. Camelback Road, Suite 500
Phoenix, Arizona 85016-4227
Tel: (602)-351-8068

*Attorneys for Plaintiff
SitePro, Inc.*